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From: The Patriots [mailto:thepatriots.eponym@gmail.com]

Sent: Wednesday, August 12, 2009 3:02 PM

To: Marx, Joshua A NWK

Cc: dennismoore@mooreforcongress.com; donna.owens@opkansas.org;

david.white@opkansas.org; paul.lyons@opkansas.org

Subject: BNSF Intermodal Facility requires Enviromental Study

I was surprised to find that the Corp of Engineers was considering granting BNSFa permit to build their Gardner Intermodal facility without an environmental impact study; especially in lieu of Waxman's impending Cap & Trade bill.

As you know, Diesel locomotives have no pollution abatement equipment or exhaust treatment prior to effluent release; the raw combustion products which include carbon monoxide, are simply blown to the atmosphere. Carbon monoxide undergoes spontaneous oxidation in free atmosphere and is an ozone trigger.

Does it make sense to penalize citizens for carbon footprints on their homes and autos while Railroads and Trucking firms get off free?

The Intermodal transit facility at Gardner will see long periods of diesel idling in addition to yard switching duties, likely with multiple units when the economy clears. These engines will generate considerable quantities of carbon monoxide during these times.

It's impractical to shutdown these engines when not in use, costs become excessive when a hostler must be on standby. Also, the unit's coolant systems are drained for many maintenance operations, how will the effluent be processed prior to release? Perhaps, it will simply follow the methodology used by the City of Overland Park on its trucks, which allow any liquid leaks, etc to be carried away by rain into the storm water system.

There are also high levels of airborne carbon particulates released during diesel operation, exacerbated under load. Then there is the noise pollution from air horns, traction motors and diesel

engine operation. The additional burden could cause Kansas City to exceed current clean air standards set by the EPA.

The KC area will see additional traffic congestion and pollution from many trucks that will travel to and from the facility along existing roads. Roads that may be inadequate to handle this new traffic, and if so, why should Johnson county and other local citizens have to pay for upgrading? And why should citizens have to suffer later for politicians anxious to jump start a failing economy by rushing capital projects not fully thought out?

I encourage you to conduct a thorough study before granting any construction permits.
I recommend that you read the case for an environmental study as published here:
http://patriot.eponym.com/blog/_archives/2009/8/6/4279107.html

Allen K. Williams, P.E.
Reg. Prof Engr; MI No. 30236
<http://patriot.eponym.com>